

IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA

RENEE ZINSKY,

Civil Action

Plaintiff,

No. 2:22-cv-547

vs.

Judge Horan

MICHAEL RUSSIN, RUSSIN FINANCIAL,
RUSSIN GROUP, SIMON ARIAS, III,
ARIAS AGENCIES, S.A. ARIAS HOLDINGS, LLC,
AMERICAN INCOME LIFE INSURANCE
COMPANY,

Defendants.

JURY TRIAL DEMANDED

**PLAINTIFF'S SECOND SUPPLEMENTAL BRIEF IN SUPPORT OF PLAINTIFF'S MOTION
FOR CONTEMPT AS TO DEFENDANT MICHAEL RUSSIN**

AND NOW, comes the Plaintiff, Renee Zinsky, by and through her counsel averring as follows:

I. INTRODUCTION

This is a civil action brought by Plaintiff requesting relief for sexual assault, battery, false imprisonment, intentional infliction of emotional distress, defamation, and intrusion of seclusion against Defendant, Michael Russin ("Defendant Russin" or "Russin"). Defendant Russin has employed threats and intimidation tactics against Plaintiff, Plaintiff's counsel, and Plaintiff's witnesses relative to this matter. This Honorable Court's decreed Defendant Russin's conduct as intolerable. Yet, Defendant Russin continues to defy the Court and obstruct justice on a constant basis and ongoing. Plaintiff's Motion for Contempt should be granted and Defendant Russin must be sanctioned accordingly.

II. FACTUAL BACKGROUND

1. Plaintiff refers this Honorable Court to her First Motion for Contempt, Brief in Support, and Supplemental Brief in Support, and incorporates the factual background herein. *See* Plaintiff's First Motion for Contempt and Brief in Support [Doc. Nos. 68, 71.]

2. On April 22, 2023, Plaintiff filed a First Motion for Contempt as to Defendant Russin

based on his ongoing violent threats and intimidation tactics relative to Plaintiff, Plaintiff's counsel, and Plaintiff's witnesses in this matter. *See* Plaintiff's First Motion for Contempt [Doc. No. 68.]

3. Due to the frequent, ongoing, and constant nature of Defendant Russin's conduct, Plaintiff was not able to file her Brief in Support of Motion for Contempt as to Defendant Russin until May 4, 2023. *See* Plaintiff's Brief in Support of Motion for Contempt as to Defendant Russin [Doc. No. 71.]

4. As noted therein, supporting evidence of Defendant's threatening and violent conduct occurred as recently as the same day of filing of Plaintiff's Brief in Support of First Motion for Contempt, i.e. May 4, 2023. *Id.* at p. 7, footnote 26 [Doc. No. 49.]

5. Just three days later, on May 7, 2023, Defendant Russin made even more threats of violence making statements such as "a good man is capable of extreme levels of violence", and "I'm telling you right now ... people are gonna die. People are gonna get mamed beyond recognition if you are after me." [Doc. No. 74.]

6. On May 8, 2023, Plaintiff filed a Supplemental Brief in Support of Motion for Contempt summarizing Defendant Russin's ongoing threats. *Id.*

7. Unbelievably, Defendant Russin's threats of violence continued thereafter.

8. For example, from May 10, 2023 to May 15, 2023, Defendant Russin published more social media posts relating to his growing gun collection, as well as the following statement: "Men kill people. Women kill society." *See* Defendant Russin Social Media Posts attached hereto as **Exhibit "A"**.

9. On May 13, 2023, Defendant Russin stated as follows "Obviously, there's one giant reason why most of you know I am predisposed to being angry with women right now, mostly liars and

whores There's one giant problem that drives most of this rage.”¹

10. Finally, on May 17, 2023, another third-party witness came forward declaring firsthand knowledge of Defendant Russin expressing angry comments toward females and ingesting illegal drugs and steroids while engaging in intimidation tactics, threats, and violence. *See* Affidavit of Chatiqua Hemingway dated May 17, 2023 attached hereto as **Exhibit “B”**.

III. LEGAL ARGUMENT

11. Plaintiff incorporates her legal arguments as outlined in Plaintiff's First Motion for Contempt and Brief in Support herein.

IV. CONCLUSION

12. Therefore, Plaintiff seeks relief from this Honorable Court in the form of sanctions as follows:

- a) Deem as contempt of Court Defendant Russin's failure to obey this Honorable Court's decree to cease and desist threatening and harassing conduct against Plaintiff;
- b) Deem the facts as designated in Plaintiff's Second Amended Complaint as established for purposes of this matter;
- c) Prohibit Defendant Russin from opposing the designated facts pursuant to Plaintiff's Second Amended Complaint;
- d) Criminal punishment for Defendant Russin, including but not limited to imprisonment, or other criminal punishment in line with the federal sentencing guidelines;
- e) Reasonable attorney's fees and costs related to the preparation of this Motion for Contempt in the amount of \$2,000.00; and,
- f) Any other relief this Court deems appropriate.

¹ Russin, Michael, Absideon Achievement Podcast, “Jewish Rappers, Cars & My Therapy Session”, May 13, 2023. <https://mrussin.podbean.com/e/jewish-rappers-cars-my-therapy-session/>. Plaintiff's counsel can make an electronic copy available to this Honorable Court upon request.

WHEREFORE, Plaintiff's counsel respectfully requests this Court grant a Plaintiff's Motion for Contempt in this matter.

Respectfully submitted,

/s/ Amy N. Williamson

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CERTIFICATE OF SERVICE

I hereby certify on this day of 18 May, 2023 I electronically served a copy of the foregoing **SECOND SUPPLEMENTAL BRIEF IN SUPPORT OF PLAINTIFF'S MOTION FOR CONTEMPT AS TO DEFENDANT MICHAEL RUSSIN** via the CM/ECF system which will send notification of such filing.

/s/ Amy N. Williamson

Amy N. Williamson, Esq.